

Nos. 18-1334, 18-1475, 18-1496, 18-1514, 18-1521

FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO

v.

AURELIUS INVESTMENT, LLC, ET AL.

AURELIUS INVESTMENT, LLC, ET AL.

v.

COMMONWEALTH OF PUERTO RICO, ET AL.

OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF ALL TITLE III DEBTORS OTHER
THAN COFINA

v.

AURELIUS INVESTMENT, LLC, ET AL.

UNITED STATES OF AMERICA

v.

AURELIUS INVESTMENT, LLC, ET AL.

UNIÓN DE TRABAJADORES DE LA INDUSTRIA ELÉCTRICA Y RIEGO, INC.

v.

FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, ET AL.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that Brief of the Cato Institute as *Amicus Curiae* Challenging the First Circuit's Ruling on the De Facto Officer Doctrine contains 7,342 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Ilya Shapiro
Counsel of Record